

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Misc. No. 17-151-LPS
	)	
BOLIVARIAN REPUBLIC OF	)	
VENEZUELA,	)	
	)	
Defendant.	)	

**[PROPOSED] SCHEDULING ORDER**

Upon consideration of the *Special Master's Joint Status Report Regarding the Proposed Scheduling Order*, IT IS HEREBY ORDERED THAT:

1. Any further discovery in this matter, including any further depositions or document discovery, shall be strictly limited to issues directly relating to a change to the Special Master's Final Recommendation or his decision not to change his Final Recommendation except as otherwise noted below.

2. To the extent Red Tree intends to present its valuation witness, Mr. Kleinrichert, as an expert at the Sale Hearing, Red Tree shall make Mr. Kleinrichert available for a deposition as soon as practicable and before the close of discovery set forth below, and the Venezuela Parties may serve a report from their valuation witness, Dr. Alberro, responding to Mr. Kleinrichert's report by August 23, 2025, at 5:00 p.m. ET. To the extent the Venezuela Parties serve an additional report from Dr. Alberro, the Venezuela Parties shall make Dr. Alberro available for a second deposition, subject to the limitations set forth in paragraph 3, prior to the close of discovery set forth below.

3. To the extent any parties wish to depose an individual who has previously been

deposed in this matter, the second deposition shall be strictly limited to issues directly relating to a change to the Special Master's Final Recommendation or his decision not to change his Final Recommendation, with the exception of any further deposition of Dr. Alberro (whose deposition shall be limited to his response to Mr. Kleinrichert's report), and the second deposition shall last no longer than three hours.

4. Any party or interested entity that wishes to call a witness at the Sale Hearing who has not previously been deposed shall make that witness available for a deposition prior to the close of discovery set forth below.

5. To the extent any party wishes to seek further limited discovery, the party should serve document requests as early as possible so that the recipients of any document requests have sufficient time to respond to those document requests before the close of discovery set forth below. Moreover, to the extent any party receives any document requests, the party should make a good faith effort to produce any reasonably requested documents on an expedited basis.

6. Any further briefing shall be limited to issues relating to a change to the Special Master's Final Recommendation or his decision not to change his Final Recommendation, with the exception of any surreplies responding to objections to the Special Master's July 2, 2025 Recommendation.

7. Any further briefs filed in this matter shall not exceed ten (10) pages.

8. The Special Master shall have no obligation or authority to consider any bids submitted after August 22, 2025, or to engage with any bidders who submit bids after August 22, 2025, absent further order from the Court. To the extent any bidder wishes to submit an unsolicited bid after August 22, 2025, the bidder shall file its bid materials on the docket with appropriate redactions to protect CITGO's confidential information and may redact the bidder's identity.

9. The following schedule is entered for future proceedings:

Event	Deadline
Deadline for submission of best and final competing proposals	Friday, August 22, 2025, by 11:59 p.m. ET
Deadline for the Special Master to (i) provide written notice to Dalinar of any Superior Proposal (the “ <b><u>Notice of Superior Proposal</u></b> ”), and (ii) file a notice on the public docket indicating whether or not a Notice of Superior Proposal was delivered to Dalinar	Monday, August 25, 2025
Deadline for Dalinar to file any motion to strike (if the Special Master provides a Notice of Superior Proposal)	Wednesday, August 27, 2025
Deadline for Dalinar to match any Superior Proposal	Thursday, August 28, 2025
Deadline for the Special Master to submit (i) an updated Final Recommendation (inclusive of any supplemental declaration in support thereof), <sup>1</sup> and (ii) a notice attaching bid materials received (such materials to be commensurate with those disclosed by the Special Master in prior bidding rounds)	Friday, August 29, 2025
Deadline to identify all witnesses that parties intend to call at the Sale Hearing (including any expert witnesses) and provide a statement summarizing each witness’s intended testimony and justification for calling them.	Sunday August 31, 2025
Deadline for any Competing Objector to disclose its own bid materials (such materials to be commensurate with those disclosed by the Special Master of the recommended bid) <sup>2</sup>	Tuesday, September 2, 2025
Deadline to serve deposition notices	Wednesday, September 3, 2025
Deadline for filing surreplies (if any) responding to objections to the Special Master’s July 2, 2025 Recommendation	Wednesday, September 3, 2025

<sup>1</sup> For the avoidance of doubt, the Special Master shall file an updated Final Recommendation whether he continues to recommend the Dalinar transaction or instead recommends a Superior Proposal.

<sup>2</sup> “Competing Objector” means any party objecting to the updated Final Recommendation on the basis that its bid should have been selected as the final recommended bid by the Special Master.

Event	Deadline
Deadline to serve any opening expert reports (strictly limited to addressing issues directly relating to a change to the Special Master's Final Recommendation or his decision not to change his Final Recommendation)	Wednesday, September 3, 2025
Deadline for filing objections to the Special Master's updated Final Recommendation	Friday, September 5, 2025
Deadline for filing responses to any Dalinar motion to strike	Friday, September 5, 2025
Deadline to substantially complete document productions	Friday, September 5, 2025
Deadline to serve any expert reports responding to any opening expert reports served on September 3, 2025	Sunday, September 7, 2025
Deadline for the Special Master to, after conferring with the Sale Process Parties and any interested entity that intends to participate in the Sale Hearing, file a joint status report regarding the requested time allotment for each party and witnesses to be called at the Sale Hearing	Tuesday, September 9, 2025
Conclusion of any further limited discovery	Tuesday, September 9, 2025
Telephonic status conference before the Court; the Special Master shall make arrangements for a court reporter for the teleconference and provide dial-in information for the call	Wednesday, September 10, 2025
Deadline for filing responses to objections to the Special Master's updated Final Recommendation	Thursday, September 11, 2025
Deadline for Dalinar to file a reply in support of any motion to strike	Thursday, September 11, 2025
Deadline for parties to notify the Court if they plan to make opening statements at the Sale Hearing	Friday, September 12, 2025, by 12:00 p.m. ET
Deadline to disclose exhibits pursuant to FRCP 26(a)(3)	Friday, September 12, 2025
Deadline to serve objections to FRCP 26(a)(3) exhibit disclosures	Saturday, September 13, 2025
Sale Hearing	Monday, September 15, to Thursday, September 18, 2025

Event	Deadline
Continuation of the Sale Hearing (if necessary)	Monday, October 20, to Tuesday, October 21, 2025

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2025.

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The Honorable Leonard P. Stark  
Circuit Judge, United States Court of  
Appeals for the Federal Circuit